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August 30, 2012

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, RM-11663, WT Docket No. 11-69, ET Docket No. 09-234

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., Harris Corporation (“Harris”) hereby notifies the Federal Communications Commission (“Commission”) of the following ex parte communication in the above-referenced proceedings.

On August 29, 2012, Dr. Dennis Martinez and Patrick Sullivan, on behalf of Harris, met with Courtney Dr. Dennis Martinez and Patrick Sullivan, on behalf of Harris, met with David Furth, John Evanoff, Brian Marengo, Dana Zelman, and Michael Wilhelm of the Public Safety and Homeland Security Bureau. The discussion centered on a Petition for Rulemaking Harris filed on April 30, 2012, seeking that the Commission require that digitally-modulated signals be certified under the H-Mask for use in public safety spectrum and adopt equipment certification technical mandates for operation on the mutual aid channels designated in 47 CFR §90.203(i) and §90.203(j)(1).

Dr. Martinez urged the Commission to ensure that TETRA and TETRA-derivative products are not permitted to be operated in the vicinity of public safety operations. He detailed that, should such products operate in public safety frequencies or in the vicinity of public safety operations, first responders will suffer significant levels of interference in adjacent channels. In fact, he noted, there is almost no difference in the significant degree of interference upon adjacent public safety operations between standard TETRA products and those modified to meet the B Mask. Further, Dr. Martinez demonstrated that leaving the matter of allowing non-H Mask-compliant technologies to operate in public safety spectrum to regional frequency coordinators is not a workable solution in NPSPAC channels, due to the 12.5 kHz channelization requirements in these frequencies and the need to create an exclusion zone for the two adjacent channels; this will require 37.5 kHz of spectrum for these technologies. Moreover, Dr. Martinez noted that permitting B Mask type certifications for digital technologies in public safety frequencies effectively eliminates the H Mask. He also discussed the need for the Commission to ensure equipment that utilizes public safety spectrum implements the least common form of interoperability via mutual aid.

Dr. Martinez also noted his discussion on this matter at a Regional Planning Commission Region 8 meeting on August 28, 2012. He stated that, at this meeting, parties indicated that multiple manufacturers, who have obtained FCC type certification for their TETRA equipment, intend on marketing that equipment for use in public safety frequencies. At the request of Commission staff, the presentations made on this matter are attached.

Respectfully submitted,

 /s/

Patrick Sullivan
Government Relations
Harris Corporation

CC:

David Furth
John Evanoff
Brian Marengo
Dana Zelman
Michael Wilhelm

Attachments